Attorneys at Law
45 Broadway, Suite 620, New York, New York 10006
Tel: (212) 248-7431 Fax: (212) 901-2107

WWW.NYCEMPLOYMENTATTORNEY.COM

A PROFESSIONAL LIMITED LIABILITY COMPANY March 1, 2023

Application **GRANTED**. Pursuant to Federal Rule of Civil Procedure 4(m), if the Complaint is not served by April 10, 2023, the case will be dismissed.

## Via ECF

The Honorable Lorna G. Schofield United States District Judge Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 The initial pretrial conference scheduled for March 8, 2023, is adjourned to **April 19, 2023, at 4:00 P.M.** At that time, the parties shall call 888-363-4749 and use the access code 558-3333. The deadline for the parties to file the joint letter and proposed civil case management plan and scheduling order is extended to **April 12, 2023, at 12:00 P.M.** 

Dated: March 2, 2023 New York, New York

RE: <u>Greenberg v. Televisa Univision, Inc., et al</u> Civil Action No. 23-cv-189 (LGS)

United States District Judge

Your Honor:

This office represents Plaintiff in the above-referenced matter. Plaintiff writes to respectfully request that the initial conference scheduled for March 8, 2023 at 4:00 p.m., as well as the deadline to submit a corresponding joint letter in advance of the conference, be adjourned to a date after April 10, 2023. The requested adjournment is necessary because, despite Plaintiff's efforts to date, Defendants have not yet successfully been served with process and counsel for Defendants have not yet appeared. *See Affidavits of Due Diligence* attached hereto as exhibits A and B. In light of our process server's initial inability to serve process, they are currently attempting to serve Corporate Defendant via the secretary of state and via the Individual Defendant's home address. Plaintiff is confident that service of process should be effected shortly and within the time prescribed by Federal of Civil Procedure 4(m). Accordingly, Plaintiff respectfully requests that the conference scheduled for March 8, 2023 be adjourned to a date after April 10, 2023.

Plaintiff thanks the Court for its time and attention.

Respectfully submitted,

PHILLIPS & ASSOCIATES, ATTORNEYS AT LAW, PLLC

By: <u>/s/ Shawn Clark</u> Shawn Clark, Esq.

Enclosure